

**POLLOCK | COHEN LLP**

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June 22, 2020

**VIA EMAIL**

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Re: *Orly Genger*, no. 19-13895 (JLG)

Dear Rocco, Yann, and Andrew:

As you know, we represent the Orly Genger 1993 Trust (“Orly Trust”), by its trustee Michael Oldner. We enclose for production documents Bates-labeled OGT\_00000001 through OGT\_00005552.

We are making this production following the meet and confer calls that I had with all three of you last Monday, June 15, 2020 and Thursday, June 18, 2020, Andrew’s email dated June 18, 2020, and the call that I had with Rocco on Friday, June 19, 2020. Specifically, we are producing:

- responsive, non-privileged documents within categories 17, 35, and 47 of Kasowitz’s Requests, as stated in our responses and objections dated June 17, 2020 to Kasowitz’s PDF directed to the Orly Trust;
- responsive, non-privileged documents within categories 2, 12, 19, and 52 of the Trustee’s Requests, as stated in our responses and objections dated June 17, 2020 to the Trustee’s PDF as directed to the Orly Trust; and
- responsive, non-privileged documents within categories 18, 40, and 52 of the Debtor’s Requests, as stated in our responses and objections dated June 17, 2020 to the Debtor’s PDF directed to the Orly Trust.

We are expressly making this production subject to, preserving, and without prejudice to all of our objections as stated in the responses and objections, without prejudice to our pending

Rocco A. Cavaliere, Esq.  
Yann Geron, Esq.  
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motion to quash (E.D. Ar. 4:20-mc-00008), without waiver of privilege, etc. We expressly reserve the right to clawback any inadvertently produced privileged materials.

We note further that we have a small number of materials produced in the *Manhattan Safety Maine v. Bowen et al.* matter that are arguably responsive to these categories but were marked confidential in that action. Please let me know if you would like me to reach out to the Brosers' attorney and to Arie Genger's attorney to see if they'll waive confidentiality as it relates to these matters.

Finally, please contact me to discuss setting up the remote deposition of the Orly Trust for Thursday.

Sincerely,

/s/ Adam Pollock

Adam Pollock

Enclosures